IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In Re:	)	Case No. 13-17916
Sheila D. Rodgers,	)	Chapter 7 Case
Debtor(s).	)	Judge Jessica Price Smith

Lauren A. Helbling, Trustee 1370 Ontario St., #450 Cleveland, Oh 44113	))	Adv. No. 15-1090
Plaintiff,	)	
vs.	)	
Social Security Administration 18711 Miles Avenue Warrensville Hts., OH 44128,	))	
ALSO SERVE:	)	
Attorney General of the United States Main Justice Building 10th Street & Constitution Ave., NW Washington, DC 20530,	))	
United States Attorney's Office Attn: Bankruptcy Section Carl B. Stokes United States Courthouse 801 West Superior Ave., #400 Cleveland, OH 44113-1852,	)))	
Office of the General Counsel Social Security Administration Attn: Bankruptcy Coordinator 200 West Adams Street, 30th Floor Chicago, Illinois 60606,	)))	
Defendant(s).	)	

TRUSTEE'S AMENDED COMPLAINT TO AVOID AND RECOVER PREFERENCE TRANSFER AND FOR MONEY JUDGMENT
(AMENDED TO CORRECT ADDRESS OF DEFENDANT)

1. The Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §1334(b) and (d) and General Order No. 2012-7, in that this action as a case under Chapter 7 of the Bankruptcy Code and being Case No. 13-17916 presently pending before this Court.

2. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A), (E), (F) and (O).

3. To the extent that the matters herein are determined not to be core proceedings, they are related to the bankruptcy case referenced above and Plaintiff consents and alleges that Defendant also consents to the referral of this adversary proceeding to the bankruptcy judge to hear and determine and to enter appropriate orders and judgments, subject to review under 28 U.S. C. §158.

4. Plaintiff Lauren A. Helbling, Trustee ("Trustee") is the duly appointed bankruptcy trustee for the bankruptcy case in which this adversary proceeding is commenced.

5. During the ninety (90) day period preceding the filing of this case, the Defendant received, by and through wage garnishment, the sum of $1,920.73 toward an outstanding balance due from debtor.

6. The transfer(s) to Defendant was made to or for the benefit of Defendant.

7. The transfer(s) to Defendant was for or on account of an antecedent debt owed by the Debtor(s) before such transfer was made.

8. The transfer(s) to Defendant was made within the ninety (90) day period preceding the date this bankruptcy was filed.

9. The transfer(s) to Defendant was made at a time when the Debtor(s) was insolvent.

10. The transfer(s) to Defendant enabled Defendant to receive more than such creditor would receive in the case under Chapter 7 of Title 11 of the United States Code if Defendant received payment of such debt to the extent provided by Title 11 of the United States Code.

11. Therefore, pursuant to 11 U.S.C. §547, Plaintiff Trustee may avoid the transfer(s) to Defendant.

12. Pursuant to 11 U.S.C. §551, the avoided transfer(s) is preserved for the benefit of the bankruptcy estate.

13. Pursuant to 11 U.S.C. §550, the Trustee may recover said transfer(s) from the Defendant.

WHEREFORE, the Plaintiff, Lauren A. Helbling, Trustee, requests judgment as follows:

1. That this Court enter an order avoiding the transfer(s) from Debtor(s) to Defendant.
2. That this Court enter judgment in favor of Plaintiff and against Defendant in the amount of $1,920.73 plus interest and costs of this action.

/s/ Lauren A. Helbling (0038934)
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